

1 RICHARD E. DONALDSON, ESQ.  
2 Bar # 1095  
3 4030 South Jones Blvd.  
P.O. Box 30697  
Las Vegas, Nevada 89173-8801  
4 (702) 382-6370 © Fax (702) 382-0836  
Attorney for Plaintiff

5  
6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

8 \* \* \* \* \*

9  
10 PAUL MISKEY )  
11 vs. Plaintiff, )  
12 )  
13 NANCY A. BERRYHILL, ACTING ) Case No. 2:19-cv-00027-JCM-VCF  
14 COMMISSIONER OF SOCIAL )  
SECURITY,  
15 Defendant. )  
16 )  
17

---

18 PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF  
19 TIME TO FILE A MOTION FOR REVERSAL AND/OR REMAND  
20 (First Request)

21 Plaintiff, RANDY G WILLIAMS by and through his attorney of record, RICHARD  
22 E. DONALDSON, ESQ., respectfully requests an extension of time of an additional thirty  
23 (30) days, to and including Monday June 10, 2019, in which to file a Motion for Reversal  
24 and/or Remand. Mr. Miskey seeks judicial review of the Commissioner's decisions that  
25 Social Security overpaid and even if it did, recoupment would be against equity and good  
26 conscience. 42 U.S.C. §404(b) and 20 C.F.R. § 404.506.

27 This request is necessary so that the Plaintiff can finish the summary, research and  
28 writing, which has taken much longer than anticipated. At the present time, Plaintiff's  
deadline to file the Motion for Reversal and/or Remand is three days from today, May 10,

1 2019, and counsel will undoubtedly be unable to finish the brief by Monday.

2 Counsel has spoken to Special Assistant United States Attorney from the Office of  
3 General Counsel Chantal Jenkins who stated she had no objection to granting this  
4 extension.

5 RESPECTFULLY SUBMITTED this 10<sup>TH</sup> day of May, 2019.

6 RICHARD E. DONALDSON, ESQ., CHTD.

7  
8 By: /S/ Richard E. Donaldson  
9 RICHARD E. DONALDSON, ESQ.  
Nevada Bar No. 1095  
Attorney for Plaintiff

10  
11  
12 IT IS SO ORDERED:  
13   
14 UNITED STATES MAGISTRATE JUDGE  
15 DATED: 5-13-2019